



# Santa Ana Watershed Project Authority

CELEBRATING 40 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP

August 24, 2012

Mr. Zaffar Eusuff  
California Department of Water Resources  
Division of Integrated Regional Water Management  
Financial Assistance Branch  
P. O. Box 942836  
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**Re: 2012 Guideline/PSPs Comments**

Dear Mr. Eusuff:

The Santa Ana Watershed Project Authority (SAWPA) is pleased to provide comments, suggestions, and recommendations to the draft 2012 guidelines and PSPs under the implementation of Integrated Regional Water Management (IRWM) Grant Program. SAWPA fully supports DWR's continued improvements to Integrated Regional Water Management planning process.

In support of DWR's interest in improved guidelines and PSPs that will most effectively deliver grant funding to integrated implementation projects, we have prepared the following comments for the draft documents released for review under the Prop 84 and 1E Integrated Regional Water Management Grant Program for Round 2.

**1. Draft 2012 Guidelines IRWM Grant Program Funded by Prop 84 and Prop 1E**

- a. Page 15. C.2. Projects Requesting Prop 84 IRWM Implementation Funding. We recommend that the text of the first sentence be corrected by replacing "one or more..." with "two or more..." in order to reflect the first part of the sentence which states eligible projects must yield "multiple" benefits. As written now, "one" defined benefit would not reflect "multiple". We also recommend greater emphasis on "multi-beneficial, multi-jurisdictional integrated" projects under Eligibility.
- b. Pages 47-48. Project Review Process, Review Factors. Under the review factors of "H. Economic Feasibility", the section has improved with the elimination of the last paragraph. However, this section still remains overly burdensome to the project review process by IRWM regions if DWR interprets this requirement literally. As written now, all projects submitted and reviewed for inclusion in the IRWM plan must include a detailed economic analysis in accordance with DWR's Economic Analysis Guidebook. This approach would be overly burdensome, unmanageable, and expensive. To conduct such analysis for projects pursuing funding through DWR grant funding is understandable but for all projects in the IRWM plan



is unreasonable to expect. This is especially difficult for smaller agencies or environmental projects where the benefits are more difficult to quantify. We recommend that this section be modified to allow the IRWM region to conduct economic feasibility on all projects as part of the review process but require the more detailed economic analysis only for the projects seeking DWR IRWM grant funding, in accordance with the new economic analysis defined in the Prop 84 Round 2 PSP.

2. Draft PSP Prop 84 IRWM Implementation Round 2 Grant

- a. Page 9, III. Funding. In interpreting the DWR funding target that not less than 10% of the available statewide funding should be used to support DACs or it may be lost and desiring to assure that all funding available is used, we recommend that DWR define and require a specific percentage (perhaps 10%) of the Round 2 grant funding for each region be directed to support DACs.
- b. Page 9, Table 2. Under Round 1, the Santa Ana region applied for and received 10% of its assigned funding schedule. However, subsequent to the release of the Round 1 PSP, an additional 10% of the funding from Prop 84 Chapter 2 was made available to all regions. However, due to challenges of restarting a ranking and award process, the additional 10% assigned to Round 1 was not used in the Santa Ana region. Can the Santa Ana region receive more than the anticipated maximum allocation schedule for Round 2 as shown in Table 2, \$1,671,000, to better distribute available funding? An inquiry to see if this amount could be increased was sent to DWR IRWM staff but no response was received.
- c. Page 16, Application Attachments Tab. We recommend that a footnote be added to Attachment 2 - Adopted Plan and Proof of Formal Adoption stating the Adopted Plan does not need to be included as an attachment if submitted under Round 1. This would assure conformity with the 2<sup>nd</sup> paragraph on Page 7 which states that the IRWM Plan does not need to be included if submitted to DWR as part of Round 1. This caveat of not having to include the adopted IRWM plan that meets the standards should also be included in the 2<sup>nd</sup> paragraph on Page 19.
- d. Page 21, Attachment 7. Technical Justification of Projects. Additional text should be added after the last sentence that clarifies a physical benefit can include non-monetized benefits such as education and technology, recreation and public access, etc. In addition using our current knowledge, flood attenuation and groundwater recharge may be difficult to quantify precisely.

- e. Page 22, Attachment 8. 3rd paragraph. We recommend adding “(if applicable)” after “quantify” similar to previous page to account for non-monetized projects that cannot be quantified.
  - f. Page 40, Project Physical Benefits. This section should include more examples of physical benefits that cannot be monetized but must be measurable.
  - g. Page 41, Annual Physical Benefits (Table 9) We recommend an additional sentence in the preface stating that Row 3 and 4 does not need to be filled out if the project benefits are solely non-monetized in nature without quantifiable benefits.
3. PSP IRWM Storm Water Flood Management Grant
- a. Page 10 – Section B – Table 2 – We recommend deleting the term “Funding Match” in parentheses after Local Contribution, implying only local funds are match. 2012 Guidelines state In-Kind and federal contributions also serve as match (II.E. of Draft 2012 Guidelines). Alternatively, add “Funding Match” in parentheses after all applicable line items.
  - b. Page 16 - Attachment 4 - Budget – Currently this section states that the funding match (50%) must be met on a per-project basis. We recommend that funding match of 50% can be met on the proposal that serves as a single application of multiple projects similar to the IRWM Implementation PSP.
  - c. Page 18 - Attachment 7 – Technical Justification of Projects. The technical justification (particularly flood risk reduction) required will be difficult to prepare in time before the deadline. The Stormwater Grant timeframe of December 2012 may not be feasible to complete such documentation if they are not already in progress. This comment also applies to Attachment 8. We recommend the deadline be extended to coincide with the IRWM Implementation PSP of March 2013.

If you have any questions regarding the comments provided, please let us know.

Sincerely,



Mark Norton, P.E., LEED AP  
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Santa Ana Watershed Project Authority